



Craig M. Reiser
Partner

Axinn, Veltrop & Harkrider LLP
630 5th Avenue
New York, NY 10111
212.728.2218
creiser@axinn.com

February 26, 2025

Via ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: In re Google Digital Advertising Antitrust Litigation, No. 1:21-md-03010 (PKC)

Dear Judge Castel:

We represent Defendants Google LLC, Alphabet Inc., and YouTube, LLC (collectively, "Google") and write to apprise the Court of developments related to Plaintiffs' letter motion to compel the production of certain materials in relation to Professor Itamar Simonson's December 13, 2024 Expert Report. See ECF No. 914. While Google offered a compromise proposal to Plaintiffs in light of the Court's recent statement that "[t]he parties are encouraged to explore compromise," see ECF No. 915, the parties remain at impasse on certain issues. To avoid further unnecessary litigation related to a witness on whom Google no longer intends to rely at trial, Google earlier today informed Plaintiffs that it no longer seeks to offer Professor Simonson's opinions in this case. Google hereby withdraws Professor Simonson's opinions, thereby mooting the dispute raised by Plaintiffs' letter motion.

Dated: February 26, 2025

Respectfully submitted,

/s/ Craig M. Reiser

Craig M. Reiser
AXINN, VELTROP & HARKRIDER LLP
630 5th Avenue
New York, New York 10111
Telephone: (212) 728-2218
Email: creiser@axinn.com

/s/ Justina K. Sessions

Justina K. Sessions**
FRESHFIELDS US LLP
855 Main Street
Redwood City, CA 94063
Telephone: 650-618-9250
Email: justina.sessions@freshfields.com

February 26, 2025
Page 2

Counsel for Defendants Google LLC,
Alphabet Inc., and YouTube, LLC
** Except as to *Associated Newspapers
Ltd., et al. v. Google LLC*, No. 1:21-cv-
03446 (PKC)

CC: All Counsel of Record (via ECF)